

Magistrate Judge Mary Alice Theiler

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

MURUGANANANDAM ARUMUGAM,

Defendants.

NO. **mj19-060**

COMPLAINT for VIOLATION

18 U.S.C. § 2252(a)(4)(B), (b)(2)

BEFORE the Honorable Mary Alice Theiler, United States Magistrate Judge,
United States Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT 1

(Possession of Child Pornography)

Beginning on a date unknown, and continuing until February 1, 2018, at
Redmond, within the Western District of Washington, and elsewhere, the defendant,
MURUGANANANDAM ARUMUGAM did knowingly possess matter that contained
visual depictions, the production of which involved the use of minors engaging in
sexually explicit conduct, and the visual depictions were of such conduct, that had been
mailed and shipped and transported in and affecting interstate and foreign commerce by
any means, including by computer, and which had been produced using materials that
had been mailed and shipped and transported in and affecting interstate and foreign

1 commerce by any means, including by computer, and the images of child pornography
2 involved include images of a prepubescent minor and a minor who had not attained 12
3 years of age.

4 All in violation of Title 18, United States Code, Section 2252(a)(4)(B),(b)(2).

5 And the Complainant states that this Complaint is based on the following
6 information:

7 I, Jayme McFarland, being first duly sworn on oath, depose and say:

8 **INTRODUCTION**

9 1. I am a Special Agent with the U.S. Department of Homeland Security
10 (DHS), Homeland Security Investigations (HSI), assigned to the Special Agent in Charge
11 Seattle, Washington, field office. I have been a Special Agent with HSI since December
12 2010. I completed the Criminal Investigator Training Program and the HSI Special
13 Agent Training Program located at the Federal Law Enforcement Training Center in
14 Glynco, Georgia. My training included courses in law enforcement techniques, federal
15 criminal statutes, conducting complex criminal investigations, physical and electronic
16 surveillance techniques, and the execution of search/arrest warrants. During my
17 employment as a law enforcement officer, I have attended periodic seminars, meetings,
18 conferences and received continued training.

19 2. As part of my duties as an HSI Criminal Investigator, I investigate criminal
20 violations relating to child exploitation and child pornography including violations of
21 Title 18, United States Code, Sections 2251(a), 2252(a)(2), 2252(a)(4)(B), and
22 2243(a)(1). I have received training in the area of child pornography and child
23 exploitation, and have observed and reviewed numerous examples of child pornography
24 in various forms of media, including media stored on digital media storage devices such
25 as computers, tablets, cellphones, etc. I have also participated in the execution of
26 numerous search warrants involving investigations of child exploitation and/or child
27 pornography offenses. I am a member of the Seattle Internet Crimes Against Children
28 (ICAC) Task Force in the Western District of Washington, and work with other federal,

1 state, and local law enforcement personnel in the investigation and prosecution of crimes
2 involving the sexual exploitation of children.

3 3. The facts set forth in this Complaint are based on my own personal
4 knowledge; knowledge obtained from other individuals during my participation in this
5 investigation, including other law enforcement officers; interviews of cooperating
6 witnesses; review of documents and records related to this investigation; communications
7 with others who have personal knowledge of the events and circumstances described
8 herein; and information gained through my training and experience.

9 4. Because this Complaint is submitted for the limited purpose of establishing
10 probable cause, it does not set forth each and every fact that I or others have learned
11 during the course of this investigation. I have set forth only the facts that I believe are
12 necessary to establish probable cause to believe that MURUGANANANDAM
13 ARUMUGAM committed the offense charged, namely, Possession of Child Pornography
14 in violation of 18 U.S.C. § 2252(a)(4)(B).

15 **SUMMARY OF PROBABLE CAUSE**

16 5. In 2016, Seattle Police Department (SPD) ICAC Detective Conine initiated
17 an investigation into the sharing of child pornography files via the eDonkey2000 (eD2K)
18 peer-to-peer (P2P) file sharing network. Beginning on July 9, 2016, Detective Conine, in
19 an undercover capacity, utilized the law enforcement version of eMule, a commonly used
20 P2P file sharing program for the eD2K file sharing network, to monitor P2P users
21 possessing and distributing image and video files depicting child pornography. Detective
22 Conine identified MURUGANANANDAM ARUMUGAM's IP address as sharing child
23 pornography files on the dates and times the downloads occurred by obtaining a King
24 County Superior Court Search Warrant for Comcast Communications related to the
25 subscriber for the suspect IP Address.

26 6. Between August 24, 2016, and April 12, 2017, Detective Conine utilizing
27 eMule, automatically downloaded approximately 2,942 complete and partial child
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1 pornography files from MURUGANANANDAM ARUMUGAM's IP address. Detective
2 Conine reviewed the downloaded files and described two as follows:

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i. **File name: !New!(Pthc)Niece Series2 (5y Full Penetration) (62m20s).mpg:** This color video file in its entirety is 1:02:29 in length. The video depicts a prepubescent female child, approximately 5 to 7 years old, lying on a bed in a residential setting. The child appears to be under the influence of a sleeping drug throughout the video. The video appears to contain multiple videos edited into one, though the circumstances are similar throughout. During the video the child is nude from the waist down and at parts of the video her shirt is removed to expose her chest. Also in the video is an adult male, usually depicted nude. As the child sleeps, the adult undresses the child, kisses the child, squeezes and sucks on the child's chest, digitally penetrates the child's vagina, orally penetrates the child's vagina, and has penile and vaginal intercourse until ejaculation. Throughout the video, the male adjusts the camera to focus upon different actions.

ii. **File name: O-Dvd 033 (Divx4).avi:** This color video file is 9:30 in length. The video has been edited and musical audio files have been added. The beginning of the video contains the title "0-DVD old movies in DVD format" and is captioned over a nude female child lying on a couch. The video appears to have been taken sometime in the 1960's to 1970's and then reformatted digitally. The video depicts a prepubescent female child, approximately 5 to 7 years old, in a residential setting. The video begins with an adult woman sitting on a brown couch. The woman is nude from the waist down and her legs are spread open, exposing her vagina. The clothed child is next to the woman on the couch and the woman is instructing the child on how to digitally penetrate the woman's vagina with the child's hand. The woman takes hold of the child's wrist and manipulates the child's hand against the woman's vagina. An adult male appears and orally penetrates the woman's vagina in front of the child. The child then orally penetrates the woman's vagina as the man assists with his hands. The man then takes hold of the child's wrist and manipulates the child's hand against the woman's vagina. The male inserts his penis into the woman's vagina. The woman takes hold of the child's wrist and manipulates the child's hand against the woman's vagina. The man and the child stand in front of the woman and the man places his penis into the child's mouth. The man forces the child to perform oral sex, and as this is happening, the woman massages the man's testicles. The woman then begins to perform oral sex on the man, and the man takes the child by the wrist and forces her to touch his penis during the process. The video changes to the woman facing away from the camera and exposing her buttocks. The child spreads open the woman's buttocks and digitally penetrates the woman's anus and vagina. The man appears and also digitally penetrates the woman. The scene changes to the child undressing and sitting on the couch. The child digitally penetrates her own vagina. The man vaginally penetrates the child with his penis. The man then ejaculates onto the child's vagina as he stands over her and she spreads her vagina open.

Several of these actions are repeated during the video, and throughout the video the male adjusts the camera to focus upon different actions.

1 7. I have reviewed these files and agree with Detective Conine's descriptions.
2 Each of these files constitutes child pornography as defined in Title 18 U.S.C. § 2256(8).

3 8. On April 24, 2017, Detective Conine received responsive search warrant
4 material from Comcast Communications identifying the subscriber of the IP Address
5 responsible for the sharing of child pornography files was MURUGANANANDAM
6 ARUMUGAM, at a residence located in Redmond, Washington.

7 9. On February 1, 2018, King County Sheriff's Office (KCSO) Detectives in
8 coordination with SPD ICAC executed a King County Superior Court Search Warrant at
9 MURUGANANANDAM ARUMUGAM's residence in Redmond, Washington. During
10 the search, law enforcement officers located a desktop computer serial number
11 206198950279 with a Seagate hard drive in MURUGANANANDAM ARUMUGAM's
12 home office that was actively running eD2K and sharing files with names commensurate
13 with child pornography including, "10yo sex_in_my_car.vk.mp4" and "(Pthc) Open-f15
14 Best Pedo Anal (Don't Miss)." Based on my training and experience, I know that
15 "PTHC" is a common term used by individuals with a sexual interest in children which
16 stands for "Pre-teen hardcore" and "pedo" is short for pedophile.

17 10. Following advisement and waiver of his constitutional,
18 MURUGANANANDAM ARUMUGAM confirmed the devices in the office were his
19 devices and confirmed he was the only user of the office desktop computer.
20 MURUGANANANDAM ARUMUGAM was initially reluctant to provide passwords to
21 the device, but ultimately provided the necessary passwords. Further,
22 MURUGANANANDAM ARUMUGAM admitted working as a software engineer, but
23 denied knowledge of eMule, the dark web, or P2P file sharing and claimed he was
24 unaware that his computer was actively running eMule or that he was in possession of
25 large amounts of child pornography. MURUGANANANDAM ARUMUGAM suggested
26 to law enforcement that a hacker was responsible for the child pornography files.

27 11. During the forensic examination of MURUGANANANDAM
28 ARUMUGAM's desktop computer serial number 206198950279 with a Seagate hard

drive, KCSO forensic examiners Do and Elliot found a forensic tool and discovered the files of suspected child pornography had been changed to a file extension of “.bak” or backup files. DFDs Do and Elliot were able to determine that the suspected child pornography files were originally Windows Media Files, MPG or MPEG video files and appeared to have been received using the eMule peer-to-peer file sharing software on ARUMUGAM’s computer. DFDs Do and Elliot also located the search terms entered into eMule by the user which included the following terms: pthc fucked, pthc 2015 2014, pthc 2015 sisters 6-11yo 0214, pthc 2015 sisters, and pthc 2015. KCSO Sergeant Turi reviewed these files and described two as follows:

i. **File Name: 9c63a300-b101-4c40-8722-80f01f75d23d.bakMD5: 45735862ddad112d118caaab16fa0907:** This video depicts a nude, white, male child approximately 8-10 years of age based on size, lack of body hair and muscle development. The child is depicted straddling a nude adult male. The child faces the camera, with the adult male’s penis in his hands and manipulates the penis with his hands. A voice in a in a foreign language is spoken in the background of the video and the adult male strokes his penis. The child is then depicted licking the adult’s penis and placing the adult’s penis in his mouth.

ii. **File Name: 54f0d8fd-c456-43d1-a59e-97ba2ed95da3.bakMD5: 824b8cf9df527125b30dda82986da8bb:** This video file depicts what appears to be a white female child approximately 8-10 years of age based upon her small size, lack of body hair or breast development. The child is seated nude in the back seat of an apparent car. Seated next to the female child is a nude, white, male child approximately 8-10 years of age, based on size, lack of body hair and muscle development. The two children speak in an unknown language while a third, unseen person records the video. The video depicts the two children kissing. The female child then bends down and places the male child’s penis in her mouth. The female child then straddles the male child and puts his penis in her mouth, while the male child performs oral sex upon the female child’s vagina. The children continue to switch positions to perform oral sex upon one another. The video ends with the female child spreading her vagina open with her hands while the camera zooms in.

12. I have reviewed these files and agree with KCSO Sergeant Turi’s descriptions. Each of these files depicts a minor engaged in sexually explicit conduct.

13. I subsequently reviewed the files located on the desktop computer serial number 206198950279 containing a Seagate hard drive. Based on my training and

1 experience, I know that Seagate hard drives are not entirely manufactured in the State of
2 Washington. Based on my training and experience, I observed approximately 450 child
3 pornography files as defined in Title 18 USC 2256(8). After reviewing the files, I believe
4 one of the files is a compilation of a known series victim named "Tara" and describe it
5 and another observed file as follows:

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i. **File Name: 5f931e78-d3d4-42bc-962a-cfc5c7cbb707.mp4:**

Video Description: this is a color video approximately 35:15 minutes in length. The video begins showing a blue screen and is entitled, "Tara 8 years old The Sensual Side". The initial depiction is of "Tara" fully nude sitting on a bed with a plaid comforter. Tara is wearing a purple and gold mask over her eyes. Tara then lays on her back and proceeds to move around into various sexually provocative positions designed to show off her genitals as well as digitally penetrates her vagina and anus. At approximately 6:14 minutes a blue screen entitled, "January 2007 8 Year Old Tara Likes to Masturbate (how horny can this fucking bitch be?!)" appears. This video depicts "Tara" fully nude on the same bed with plaid comforter and she is masturbating. At 8:28 minutes, the blue screen appears and is entitled, "Tara 8 years old January 2007 Tara's Little Asshole". This clip depicts Tara nude and kneeling face down on the bed with the plaid comforter and the camera is focused on her anus. Tara digitally penetrates her anus. At 12:03 minutes the blue screen entitled, "coming soon, Tara' Bed time Rape, Tara 8 years old, Ass fuck and ass vibrator". This video depicts an adult male nude lying on his back and "Tara" on top of the male straddling him. The adult male vaginally penetrates Tara with his erect penis. Tara is then kneeling on her hands and knees with her buttocks facing the camera and the adult male anally penetrates Tara with a white vibrator. At 19:35 the blue screen appears entitled, "Tara's Oral Explosion" and depicts the same adult male kneeling on the bed with the plaid comforter. The adult male pulls Tara's face to his erect penis and holds Tara's head forcibly causing her to perform oral sex on him. The video pans to another clip of Tara performing oral sex on the adult male. Multiple clips of Tara performing oral sex on the adult male are shown. At 22:59 the blue screen appears and is entitled, "Tara 8 years old, Ass to Mouth, ...her daddy really treats her like a total fucking whore!". This clip depicts Tara nude but wearing a yellow and maroon mardi gras type mask with feathers over her eyes. Tara is performing oral sex on a nude adult male. The next clip is of Tara lying on her back on a bed and the adult male kneels over her and lifts her legs over her head and begins anally raping her. He then forces Tara to perform oral sex on his penis after he just had his penis in her anus. This pattern occurs several times with the adult male anally raping Tara then causing her to perform oral sex on his penis. The adult male then uses a vibrator to expand Tara's anus and he lifts the camera to zoom in on Tara's enlarged anus. The last clip depicts the adult male kneeling over Tara masturbating until he ejaculates into her mouth and on her face.

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ii. **File Name: af2a90d7-7387-42cf-9fdd-80b0c7d31a86.mp4:**

Video Description: This color video is approximately 2:30 minutes in length. The video depicts a baby, approximately 2 years old, standing wobbly facing a male child, who is sitting on a chair. The baby and male child are fully nude however, the male child's face is not visible on camera. The male child appears to be approximately 6-8 years old based on his small stature, lack of muscular development and no body or pubic hair. The male child's penis is erect and the baby grabs the penis and strokes it. The male child then grabs the baby's head and forces the baby to suck on his penis. The baby screams and backs up then strokes the male child's penis again. The male child grabs the baby again and forces the baby to suck on his penis. The camera then pans up to show the male child's face as he masturbates. Based on the camera location and movement, it appears a third person was recording the encounter from beside the victims.


CONCLUSION

14. Based on the above-stated facts, I respectfully submit that there is probable cause to believe that MURUGANANANDAM ARUMUGAM committed the offense charged in this Complaint.


 JAYME MCFARLAND, Complainant
 Special Agent
 Homeland Security Investigations

Based on the Complaint and Affidavit sworn to before me, and subscribed in my presence, the Court hereby finds that there is probable cause to believe the Defendant committed the offense set forth in the Complaint.

DATED this 6 day of February, 2019.


 MARY ALICE THEILER
 United States Magistrate Judge